

June 16, 1981



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E.P.A. -- D.L.P.C.
STATE OF ILLINOIS

Mr. Thomas E. Cavanaugh, Jr., Manager
Residual Management Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

SUBJECT: Reapplication for Process Alliance
Partnership (PAP) Development Permit;
D.E.Matschke Company File No. 1042.001

Dear Mr. Cavanaugh:

The purpose of this transmittal is to reapply for a PAP development permit.

Timetable

Your letter denying our earlier application was dated June 9, 1981, postmarked June 11, 1981 and was delivered to PAP yesterday, June 15, 1981. This is an IEPA breach of a time constraint set by the IEPA. Your letter stated that PAP's application was received April 30, 1981. Special condition of PAP's IEPA experimental permit specifically stated that "such agency decision shall be rendered within 30 days after receipt of said development permit application".

Your agency's failure to meet your own constraint has placed PAP involuntarily at risk because of other timetables also specified by your agency in PAP's experimental permit. Had IEPA abided by their time constraint, your letter of denial would have been mailed on or before May 30, 1981. This would have allowed PAP to reapply to your agency by approximately June 5, which would have allowed IEPA up to an additional 30 days or approximately to July 5 to reassess PAP's development permit application.

Presuming a successful reassessment of PAP's development permit application would have permitted PAP to apply for an operating permit by July 8, 1981. Special condition 8C of PAP's experimental permit dated March 30, 1981 specifically states "apply for an operating permit to the Division of Land Pollution Control, provided that a development permit has been issued by this agency. (Application for such operating permit shall be made within 100 days from the date of this permit)." The effect of this constraint is to require PAP to apply for an operating permit by July 8, 1981. If IEPA takes the prescribed 30 days for a favorable review of this June 16, 1981 reapplication, PAP cannot possibly apply for an operating permit by July 8, 1981.

The inability of PAP to be able to apply for an operating permit by July 8, 1981 also causes involuntary breach of other time constraints laid-down by IEPA in PAP's experimental permit, namely 9B which states "The agency will hold public hearings on the matter of the issuance of an operating permit. Said public hearings shall be held within 30 days after receipt of permittee's application for an operating permit. The agency shall render its decision to either grant or deny the operating permit within 45 days after such application is made. "and 8D which states "obtain all necessary IEPA permits (within 150 days from the date of this permit)." Since the experimental

permit was granted on March 30, 1981, 150 days later would occur on or about August 27, 1981. Subtracting 45 days allowed IEPA for an operating permit and public hearing review process would require operating permit application by approximately July 14, 1981. If IEPA takes the prescribed 30 day period for a favorable review of this June 16, 1981 reapplication, PAP cannot possibly apply for an operating permit by July 14, 1981.

For the reasons cited above, PAP hereby requests that either IEPA establish a new timetable consistent with the delay introduced by IEPA or abide by the original timetable by appropriately reducing the IEPA review period of this reapplication for development permit.

Discussion of IEPA Review Comments

Comment 1 - This comment states "The application does not describe how the site is or shall be developed so that no liquid can flow from the property (Special Conditions No.2 and 8*)". PAP believes this question has been fully addressed in previous submittals.

In the April 29, 1981 application for development permit, response to Special Condition 2 on page 2 contained a lengthy explanation of circumstances relating to an alleged flow onto adjoining Corps of Engineer property. Please refer to the attached Exhibit 1, the April 29, 1981 application for development permit.

In the April 29, 1981 application, earlier transmittals to IEPA dated October 10, 1980; February 3, 1981; and February 28, 1981 were incorporated by reference and made part of the application. This procedure avoided duplication of paper work and was affirmed by telephone conversation on April 27, 1981 with Rama Chaturvedi of your Section as being consistent with IEPA methods. Special Comment a, on page 2 of the February 3, 1981 transmittal contains a comprehensive discussion of how the PAP site has been developed and managed to eliminate liquid waste flow from the property. The topographic contour lines showing the natural depression at the northeast corner of the PAP site have been reestablished and are presented along with the location and description of the east-west lying clay berm in Exhibit 2 (revised) page 26 of the October 10, 1980 transmittal and in Exhibit 1, page 5 of the April 29, 1981 transmittal. These revised prior exhibits are presented as Exhibits 2 and 3 of this reapplication.

Comment 2 - IEPA states a complete, 24"x 36" plan sheet was not submitted in the original October 10, 1980 development permit application. PAP supplied plan sheets according to the specifications contained in the instructions for IEPA "Application for Permit to Develop a Solid Waste Management Site" Specifically these instructions, as contained in Part IV, Section A, sub-parts 23 and 24, provide for a scale of one inch equal to two hundred feet or larger with topographic contour intervals of two feet. PAP exceeded these requirements by providing a scale of one inch equal to forty feet and with topographic contour intervals of one foot. The resulting plan sheet was of an 8 1/2 x 11 inch size.

The plan sheets show the location of the protective berm. A description of the protective berm is contained in the narrative section of the transmittals. The revised plan sheets, exhibits 2 and 3 of this transmittal, show the location as well as a description of the protective berm plus other added details.

PAP is of the belief that these modified plan sheets are complete in every detail. PAP will comply if IEPA has new regulations requiring 24 x 36 inch plan sheet size. However, unless there are new inclusions to be contained on the plan sheets, other than those provided for in Part IV, Section A, sub-parts 23 and 24, there can be no added detail.

Comment 3 - IEPA stated that the dumpster box and dumpster-box operations were not adequately described. The dumpster box consists of a standard twenty cubic yard welded steel dumpster box that has been customized for PAP's operations. This is best demonstrated by referring to Exhibit 4 of this transmittal. PAP filter-cake is relatively spongy and heavy. After placement of filter cake in the dumpster and after removal to the landfill site, the filter cake is most practically discharged by rolling the dumpster box. Structural cross braces have been installed on the PAP boxes to permit this operation without incurring damage to the boxes.

Custom provisions for covers for the boxes consist of 1) horizontal steel side strips for securing the multiple rubber hold-downs for the plastic cover, 2) multiple retaining brackets along the top of each long side of the of the boxes for positioning the cover retaining trusses, 3) the steel retaining trusses for the covers and 4) the custom made, heavy duty flexible plastic covers complete with built-in grommets and attached multiple rubber hold-downs. The cover is held tightly and makes a good seal against the top shoulder of the dumpster box to seal off odors.

Filter cake is removed via the dumpster boxes to the IEPA approved landfill site generally at a frequency of two a week. However, this frequency can vary from one to three loads per week.

Comment 4 - IEPA states continuing odor problems reported at PAP. PAP believes that, since the early part of January, 1981 when permanent facilities were placed on-line, odor production from PAP has been entirely due to operational mishaps, housekeeping problems and residual problems associated with old spill areas. Much attention has been recently devoted to added operator training, improved housekeeping practice and to identifying and removing residual odor sources.

The IEPA log of complaints demonstrates the relative success in containing odor problems since the beginning of 1981. One operational mishap occurred on March 29 which resulted in increased site odor for a brief period and a small quantity of oil reaching a Joliet STP catch-basin. This problem was promptly rectified. Another period of increased site odor occurred during the first two weeks of May when residual spill areas and a buried railroad siding were excavated to remove contaminated soils. While the final result from this activity was significantly reduced residual odors, there was increased odor during the period of excavation even though climatic conditions were favorable for low odor production and transmission.

PAP believes that the continuing problems referred to by Ralph Houck of the Corps of Engineers primarily refer to these periods. Odor observations at other periods by COE personnel have generally been of low intensity, based upon PAP perusals of the COE logs. The COE is not satisfied with even low intensity odor and neither if PAP. PAP is determined to reduce and hopefully eliminate all remaining off-premises odor to a generally undetectable level and believes this is already accomplished the majority of the time. For example, there has been not one citizen or city odor complaint logged against

PAP since early in January by other than PAP's immediate neighbor to the south, the COE. The reports contained in the IEPA log since the beginning of 1981, with the exception of the COE comments and the March 29 incident, refer to incidents that occurred before PAP permanent facilities were finalized in the first few days of January.

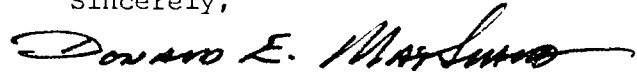
The remaining odor source at PAP is believed to be principally housekeeping practices within the processing building and at the unloading area. The newly instituted closed hopper for receiving sludge at the filter press has significantly reduced odor incidence in the process building. Additional planned steps for odor control include 1) a concrete unloading pad and sump to receive any occasional spills incidental to loading and unloading and to facilitate clean-up and removal, 2) increase vigilance and training to improve housekeeping and reduce unnecessary process residuals in the PAP building environment, 3) search-out any remaining low intensity residual odor sources on the PAP exterior premises.

PAP is determined to contain off-site odor so that the PAP premises can be considered a good industrial neighbor for the COE and all persons in Joliet. PAP will be implementing the further steps indicated above in the coming weeks. The opportunity to gauge final success will be the public hearing that will review PAP's accomplishment. IEPA can be assured that every possible step will be taken to earn a PAP operating permit.

Comment 5 - IEPA requests volumetric fraction and sulfide/sulfite information. PAP provided volumetric rate information in the February 3, 1981 transmittal in special comment b on Page 2. Using this information as a basis, the volume discharge fractions are 0.95 gallons STP discharged per gallon of liquid waste, 0.002 - 0.005 gallons oil recovered per gallon of liquid waste and 0.04 - 0.005 gallons filter-cake volume to land-fill per gallon of liquid waste. The sulfite concentration in all waste streams is essentially zero. The sulfide concentration in all waste streams, with the exception of the spent caustic stream, is essentially zero. The sulfide concentration of the spent caustic waste stream is generally in the 2,000 - 6,000 mg/l range, as contained in the data provided in the February 3, 1981 transmittal, Analytic Exhibit 1.

Please let me know if you have any questions or need additional information. PAP needs this development permit in order to qualify for the IEPA review and the public hearing odor review for the operating permit.

Sincerely,



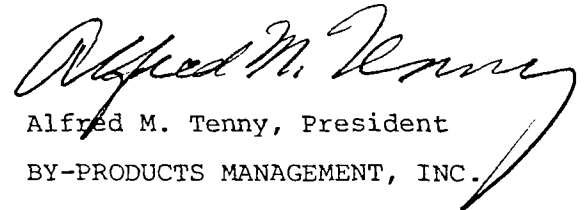
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DEM:em w/4 exhibits

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P.S. Alfred Tenny is out of town as of this mailing. A second copy, signed by both partners, will be mailed later this week.